

### **REMARKS**

In the Office Action, the Examiner took the following actions:

rejected claim 1 under 35 U.S.C. § 103(a) as being unpatentable over *Polizzi* et al (U.S. Patent No. 6,643,661) in view of *Wagner* et al. (U.S. Patent Publication N.O. 2003/0078830) and further in view of *Kukkai* (U.S. Patent No. 7,124,355);

rejected claims 2-7 under 35 U.S.C. § 103(a) as being unpatentable over *Polizzi* in view of *Wagner* and further in view of *Kukkai* and further in view of *Anuff* et al. (U.S. Patent No. 6,327,628);

rejected claim 9 under 35 U.S.C. § 103(a) as being unpatentable over *Polizzi* in view of *Wagner*;

rejected claims 10-15 under 35 U.S.C. § 103(a) as being unpatentable over *Polizzi* in view of *Wagner* and further in view of *Anuff*, and

rejected claim 16 under 35 U.S.C. § 103(a) as being unpatentable over *Polizzi* and *Wagner* in view of *Kukkai*.

Claims 1-7 and 9-16 are currently pending.

### **35 U.S.C. § 103(a) REJECTIONS**

Applicants respectfully traverse the §103 rejections of claims 1-7 and 9-16. A *prima facie* case of obviousness has not been established.

The key to supporting any rejection under 35 U.S.C. §103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. Such an analysis should be made explicit and cannot be premised upon mere conclusory statements. See *M.P.E.P.* § 2142, 8th Ed., Rev. 6 (Sept. 2007). "A conclusion of obviousness requires that the reference(s) relied upon be enabling in that it put the public in possession of the claimed invention." *M.P.E.P.* § 2145. Furthermore, "[t]he mere fact

that references can be combined or modified does not render the resultant combination obvious unless the results would have been predictable to one of ordinary skill in the art” at the time the invention was made. *M.P.E.P. § 2143.01 (III)*, internal citation omitted. Moreover, “[i]n determining the differences between the prior art and the claims, the question under 35 U.S.C. § 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious.” *M.P.E.P. § 2141.02(1)*, internal citations omitted (emphasis in original).

“[T]he framework for objective analysis for determining obviousness under 35 U.S.C. 103 is stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 U.S.P.Q 459 (1966)... The factual inquiries ... [include determining the scope and content of the prior art and] ... [a]scertaining the differences between the claimed invention and the prior art.” *M.P.E.P. § 2141(11)*. “Office personnel must explain why the difference(s) between the prior art and the claimed invention would have been obvious to one of ordinary skill in the art.” *M.P.E.P. § 2141(11)*.

Independent claim 1 recites a method including “presenting, in the personal workspace, a second workset that defines a second work role of the user.” *Polizzi, Wagner, Kukikai, and Anuff*, alone or in combination, do not disclose or suggest at least these claimed features for the following reasons.

*Wagner* discloses a portal system within a marketing organization. (Paragraph [0035]). In *Wagner*, “[e]ach user has a **unique identifier**, and so when a user accesses the web-server 40 for access to the user’s portal, the web-server ... **accesses the appropriate user portal file**, and provides the user with the appropriate requested portal page.” (Emphasis added). (*Wagner*, paragraph [0024]). Furthermore, “**each**

**user has a role associated with the portal file.** As such, their portal will have a default design that meets the needs of users fulfilling the role that the user serves in the marketing organization.” (Emphasis added). Id. That is, in *Wagner’s* portal system, each user, who is represented by a unique identifier, is associated with only a single role. For a given user, a role is defined in the portal file specific to that user, so that the design of any returning portal pages can be tailored in accordance with the user’s role. Thus, *Wagner’s* system does not disclose or suggest supporting multiple roles for a given user. As such, *Wagner* fails to teach or suggest “presenting, in the personal workspace, a second workset that defines **a second work role of the user,**” as recited in claim 1 (emphasis added).

The Office Action appears to allege that, with respect to paragraph [0009] of *Wagner*, role portal component 44 and workbench component 46 in Figure 4 of *Wagner* teaches “presenting, in the personal workspace, a second workset that defines a second work role of the user.” (Office Action, p. 5). The Office Action’s allegations are incorrect for at least the following reasons.

Role portal component 44 and workbench component 46 in Figure 4 of *Wagner* is described in paragraph [0009] of *Wagner* and further explained in paragraph [0034] of *Wagner*. Specifically, Figure 4 of *Wagner* discloses a “conceptual design of the portal layer 42.” (*Wagner*, paragraph [0034]). *Wagner* further discloses that “[t]he portal layer 42 includes the previously mentioned role portal component 44, within which is **identified example roles** that may be appropriate for a particular marketing organization” (emphasis added). Id. Furthermore, *Wagner* discloses that “the workbench component 46 is designed to provide pages that give the most applicable

information to a user **according to the role the user** serves within the marketing organization” (emphasis added). (*Wagner*, paragraph [0035]). Additionally, *Wagner* discloses “[a] workbench component [46] generates, on a user display, a workbench that corresponds to each of the role portals.” (*Wagner*, paragraph [0009]). That is, in *Wagner*, role portal component 44 does not teach or suggest “a second work role” of a given user, as recited in claim 1. Instead, role portal component 44 merely serves as a component within the conceptual design of the portal system to include a list of possible roles that a user may belong within a marketing organization. On the contrary, the workbench that corresponds to the role portal in *Wagner* includes web pages that are customized for a given user, based on the unique role of the user. Thus, this workbench of *Wagner* is associated with the unique role of a user. As such, the workbench of *Wagner* fails to teach or suggest “a second work role” of a given user, as recited in claim 1.

Accordingly, role portal component 44 and workbench component 46 in Figure 4 of *Wagner* fails to teach, or even suggest, “presenting, in the personal workspace, a second workset that defines a second work role of the user,” as recited in claim 1.

*Polizzi*, *Kukkai*, and *Anuff* do not compensate for the deficiencies of *Wagner*. The Office Action alleges that *Polizzi* teaches generating information views (Office Action, pg. 3); *Kukkai* teaches navigating back to the execution level page (Office Action, pg. 5); and *Anuff* teaches control level pages including messages and work triggers. (Office Action, pg. 6). Even if these allegations are correct, which Applicants do not concede, *Polizzi*, *Kukkai*, and *Anuff*, taken either individually or in combination, still do not teach or suggest the above discussed claimed features of “a second work

role of the user." Therefore, *Polizzi, Wagner, Kukkal, and Anuff* do not teach or suggest all of the elements of claim 1.

Independent claim 9, while differing in scope, recites elements similar to those of claim 1 discussed above. Accordingly, the rejection of the independent claim should be withdrawn for similar reasons.

Dependent claims 2-7 and 10-16 depend from independent claims 1 and 9. The rejections of the dependent claims are improper and should be withdrawn at least due to their dependence.

### **CONCLUSIONS**

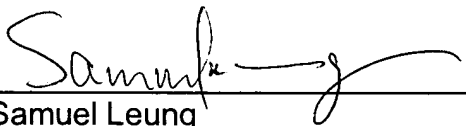
In view of the foregoing remarks, Applicants request the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

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